

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

KATIE MILILLO, IRENE JOHNSON
JANINE HELLER and TOMAYITA
STEVENSON,
Plaintiffs,

v.

WHITMAN EDUCATION GROUP,
INC., CAREER EDUCATION
CORPORATION, ULTRASOUND
DIAGNOSTIC SCHOOL and
LOUIS GIANNELLI,
Defendants.

Civil Action
No. 04-30130-MAP

**DEFENDANT LOUIS GIANNELLI'S
MOTION TO ENLARGE THE TIME**

Defendant Louis Giannelli hereby moves that the time within which he must answer and/or otherwise respond to the Plaintiffs' Complaint be enlarged up to and including October 29, 2004.

DEFENDANT
LOUIS GIANNELLI
By his attorneys,

/s/ Christopher R. O'Hara
Christopher R. O'Hara (BBO #548611)
Tricia A. Rice (BBO #633556)
TODD & WELD LLP
28 State Street, 31st Floor
Boston, MA 02109
(617) 720-2626

Dated: October 22, 2004

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I, Christopher R. O'Hara, hereby certify pursuant to Rule 7.1 of the Local Rules of the United States District Court for the District of Massachusetts that I have made a reasonable and good faith effort to reach Plaintiffs' counsel to obtain an extension but was unable to do so, insofar as Plaintiffs' counsel, Suzanne Garrow, Esq., is out of the office until next week.

/s/ Christopher R. O'Hara
Christopher R. O'Hara